UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES LIABILITY INSURANCE CO., INC., AS INSURER OF ADMINASERVICE, INC.))))
Plaintiff,	,)
,) CIVIL ACTION NO. 04-11824 PBS
V.)
)
ADVANTIUS, INC., NEAL)
BERGSTROM, ROBERT)
STEVENS, CHARLES CAMBRA,)
III, JONATHAN K. DRIGGS, AND)
WORKFORCE SOLUTIONS, INC.,	
Defendants.)))

MOTION FOR JUDGMENT BY DEFAULT AGAINST ROBERT STEVENS AND NEAL BERGSTROM

Comes now, the plaintiff, United States Liability Insurance Co., Inc., as insurer of AdminaService, Inc. and hereby prays that this Court enter defaults against the defendants Robert Stevens and Neal Bergstrom pursuant to Fed.R.Civ.P. 55 (a) and 55(b)(1) for failure to plead or otherwise defend as required by Rules 12 and 14.

In support of this motion, the plaintiff states the following:

- 1. Robert Stevens was served individually on October 4, 2004 and his answer or response to the complaint was to be filed November 3, 2004. He has not filed an answer or other responsive pleading to date.
- 2. Neal Bergstrom was served on October 4, 2004 and he filed a motion to dismiss which was denied on December 16, 2004 and entered onto the docket on December 21, 2004.

He has not filed an answer to date.

WHEREFORE, United States Liability Insurance Co., Inc., as insurer of AdminaService, Inc. respectfully requests that the Court enter an order granting judgment by default against Robert Stevens and Neal Bergstrom plus interest and costs, and any other relief this Court deems just and appropriate.

Respectfully Submitted,

UNITED STATES LIABILITY
INSURANCE CO., INC., AS
INSURER OF ADMINASERVICE, INC.,
By its attorneys,

/s/ Susan M. Morrison Susan M. Morrison BBO #553095 Fitzhugh, Parker & Alvaro, LLP 155 Federal Street Boston, MA 02110 tel: 617-695-2330

Dated: April 26, 2005